

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

(1) ANDREW CHABALLA, as
Next of Kin of LAVERNE SOMERS,
Deceased, and ANDREW
CHABALLA as Administrator of the
Estate of LAVERNE SOMERS

Plaintiffs,

v.

Case No. 5:22-cv-00772-F

(1) SP HEALTHCARE
MANAGEMENT LLC

(2) MIDWEST GERIATRIC
MANAGEMENT, LLC

(3) JUDAH BIENSTOCK

Defendants.

DEFENDANTS' FED R. CIV. P. 26(A)(2) DISCLOSURE OF EXPERT WITNESSES

COME NOW, Defendants, in accordance with Fed. R. Civ. P.26 (a)(2) submits its
following disclosure of its expert witness:

Fed. R. Civ. P. 26(a)(2)(b) Retained Expert Witness:

1. Dr. Robert Kelly, M.D.
929 College Avenue, Ste. B,
Fort Worth, Tx

Dr. Kelly is expected to testify as to nursing home standard of care, causation of death,
and Ms. Somers's medical diagnoses at South Pointe and beyond. Dr. Kelly will also testify as to
any and all opinions attached hereto as Exhibit A, and fully incorporated herein by reference. Dr.
Kelly is also expected to testify with rebuttal opinions to Plaintiff's experts, Dr. Kirby, Suzanne
Frederick, and Edana Stroberg. Dr. Kelly is expected to testify that all his opinions are held to a

reasonable degree of medical probability and are based on his education training and experience, review and knowledge of the records and other records documents identified in his report. Dr. Kelly's Report, curriculum vitae, fee schedule, and testimonial history are included as exhibit A.

**DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.**

s/Brian M. Keester

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Certificate of Service

I hereby certify that on March 12, 2024, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

s/Brian M. Keester

Brian M. Keester